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State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT

HAZARDOUS SITE MITIGATION ADMINISTRATION  
CN 028, Trenton, N.J. 08625

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08 AUG 1985

Nigel Robinson  
U.S. Environmental  
Protection Agency  
26 Federal Plaza  
New York, NY 10278

Re: Millington Asbestos Dump Site

Dear Mr. Robinson:

Please find attached the NJDEP comments on the Site Operation Plan prepared by Fred C. Hart Associates, Inc. for the Millington Asbestos Dump and the three Satellite sites.

page 1-1. 1.0 Introduction

All references to Pire Valley Tree Service must be deleted and, the site shall be identified as 257 New Vernam Road.

page 2-2 2.2 Health, Safety and General Site Reconnaissance (Page 2)

This task must include an evaluation of respiratory hazards for the general public as a result of air borne asbestos fibers at the Great Swamp, 257 New Vernam Road, and White Bridge Road Sites. Should an immediate health hazard exist action must be expeditiously taken, with the approval of EPA and NJDEP to mitigate the danger to the public.

page 2-4 2.5 Site Specific Health and Safety Requirements (Task 5)  
and 2.6 Site Specific Quality Assurance/Quality Control QA/QC Re-  
quirements (Task 6)

It is the NJDEP's understanding that all analytical data will be reviewed by EPA QA/QC personnel and validated by EPA. EPA will have its Health and Safety Officer review these plans. Therefore, we are deferring comments on these areas to EPA.

page 2-4 Sub-surface Investigation (Task B)

All sampling equipment must be certified laboratory clean.

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page 2-5. 2.8.1 Hydrogeologic Investigation (Subtask 8.1)

Millington Site

All borings for four (4) inch well, will be advanced with an eight-inch inside diameter hollow stem auger and borings for six (6) inch wells will be advanced with a ten-inch inside diameter hollow stem auger.

The following decontamination procedure must be utilized for field cleanup when necessary.

- ° Initial wash with Alconox detergent
- ° Tap water rinse
- ° Deionized water rinse
- ° Solvent rinse ~~methanol~~ or acetone)
- ° Air-dry ~~or~~ deionized water rinse

page 2-7 Millington Site

All split spoon samples will be monitored for head space analysis with an Organic Vapor Analyzer (OVA) and a Photo Ionization Detector (PID). The monitor wells shall be advanced with an eight-inch inside diameter hollow stem auger and a four-inch stainless steel casing will be set into the hole.

page 2-8 Figure 2-2.

The NJDEP well specification on page A-10 of Appendix 1 of the Consent Order must be used. Please provide the documentation for the estimate of 10 feet of open hole.

page 2-9 Millington Site

All monitoring wells must have the well permit number permanently affixed to each monitor well. All four-inch borings must be advanced using an eight (8) inch inside diameter hollow stem auger. All wells must be constructed with stainless steel screen.

page 2-10 Figure 2-3

The NJDEP well specification on page A-12 of Appendix 1 of the Consent Order must be used.

For the Millington site if no water is encountered in the unconsolidated zone the Department is requesting that the remaining wells be installed in the bedrock with the exception of monitoring wells 902, 903, 904.

page 2-11 Great Swamp Site

The Department's requesting some flexibility in the finished depth of the monitoring wells based on field conditions. Specifically the Department is requesting the ability to modify well depths based on field conditions in consultation with USEPA and Fred C. Hart Associates.

page 2-12 White Bridge Road and Pine Valley Tree Service Sites

Delete the reference to Pine Valley Tree Service. All monitoring wells must be allowed to rest for a minimum of two (2) weeks after development prior to being sampled.

page 2-18 2.10.1 Surface Water and Sediment Sampling (Subtask 10.1)

The Department is requesting that the following sampling points include a sediment sample.

Passaic River - The northern most sample above the continuence with the Great Brook.

Great Brook - above the confluence with the Passaic River.

Middle Brook - above confluence with Black Brook.

page 2-26 2.10.4 Groundwater Sampling (Subtask 10.4)

All bailers must be certified laboratory clean and dedicated to the sampling point. Nylon rope is unacceptable for well bailing, stainless steel wire must be used.

Field filtering is only acceptable for samples collected for metal analysis, all other samples must not be filtered. In addition all filtering apparatus must be certified laboratory clean and dedicated to each sampling point.

page 3-1. Project Organization

A site Safety Office must be on site at all times and must have the authority to stop work if necessary.

If you have any questions regarding these comments or require any additional information please feel free to contact me at 609-984-3074.

Very truly yours,

  
George Klein  
Site Manager

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